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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 ROSEN MARIANO, an individual,

CASE NO.: 2:18-CV-01911-APG-EJY

14 Plaintiff,

15 vs.

16 THE CITY OF LAS VEGAS, a political
17 subdivision of the State of Nevada; CORRECTIONAL HEALTHCARE
18 COMPANIES, INC., a foreign corporation; CORRECT CARE SOLUTIONS, LLC, a foreign
19 limited liability company; MICHELE FREEMAN, Chief of Detention Enforcement for
20 the City of Las Vegas; CORRECTION OFFICER DOE 1-10; HEALTHCARE WORKER DOES
21 11-20; DOES 21-99; inclusive; ROE CORPORATIONS 100-199, inclusive,

22 Defendants.

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE JOINT
PRETRIAL ORDER**

(First Request)

24 IT IS HEREBY STIPULATED AND AGREED, between the Parties, by and through their
25 respective counsel of record, that the deadline for the proposed joint pretrial order will be extended to
26 December 13, 2023. This is the Parties' first request to extend time. This Stipulation and [Proposed]
27 Order is submitted in accordance LR IA 6-1.
28



1 The Parties respectfully request this brief extension of time to accommodate both parties in
2 light of the Thanksgiving holiday. In addition, the Parties respectfully request this brief extension of
3 time to accommodate Plaintiff's counsel. Specifically, Mr. Prince has family (daughter, son-in-law,
4 and one-year-old grandson) coming into town November 18-25, 2023. Mr. Prince is hosting his
5 grandson's one year birthday party at his house on November 22, 2023. The requested extension of
6 time will allow the Parties to comprehensively address the matters in the Joint Pretrial Order. The
7 Parties' requested extension is not made in bad faith or to unnecessarily delay these proceedings.
8 Therefore, the Parties respectfully request the Court approve the foregoing stipulation.

9 DATED this 16th day of November, 2023

10 DATED this 16th day of November, 2023

11 **PRINCE LAW GROUP**

12 **LEWIS BRISBOIS BISGAARD & SMITH**

13 */s/ Dennis M. Prince*
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18 Attorneys for Plaintiff
19 *Rosen Mariano*

20 */s/ Ethan M. Featherstone*
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26 Las Vegas, Nevada 89118
27 Attorneys for Defendant
28 *Correct Care Solutions, LLC*

18 DATED this 16th day of November, 2023

19 **LAS VEGAS CITY ATTORNEY'S OFFICE**

21 */s/ John A. Curtas*
22 BRADFORD R. JERBIC
23 Nevada Bar No. 1056
24 JOHN A. CURTAS
25 Nevada Bar No. 1841
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27 Las Vegas, Nevada 89101
28 Attorneys for Defendants
29 *City of Las Vegas and Michelle Freeman*

30 IT IS SO ORDERED.

31 
32 _____
33 U.S. MAGISTRATE JUDGE

34 Dated: November 17, 2023